

March 2021

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X		
Kelly MacNeal	:	CIVIL ACTION NO.: 23-cv-5890
	:	
	:	
Plaintiff,	:	
	:	
against	:	
	:	
The City of New York	:	
	:	
Defendant.	:	
	:	
	X	
-----		

**PROPOSED CASE MANAGEMENT PLAN FOR PRO SE CASE**

**1. Summary of Claims, Defenses, and Relevant Issues.**

Plaintiff/Defendant (circle one)

Following the Court's decision in Defendant's motion to dismiss, the sole remaining claim is

the City Commission on Human Right's alleged refusal to bring a complaint on behalf of  
plaintiff on account of her subsidized tenant status due to alleged racial discrimination.

Plaintiff has filed a motion for reconsideration on the Court's decision to dismiss the other claims  
in her amended complaint. The Court has ordered defendant to file opposition by March 28, 2025.

**2. I understand my obligation to and am preserving relevant information.**

Plaintiff/Defendant (circle one)

**3. Proposed Schedule**

All discovery should be completed by December 19, 2025

a. Depositions: Depositions shall be completed by December 5, 2025

b. Neither party may take more than \_\_\_\_\_ depositions. Absent an  
agreement between the parties or an order from the Court, non-party  
depositions shall follow initial party depositions.

- c. Initial Requests for Documents must be made by August 22, 2025
- d. Responses to Requests for Documents must be made by October 3, 2025.
- e. Documents from third-parties (such as doctors) will/will not (circle one) be required. If required, the following are the third-parties from whom Documents will be requested.
- Defendant's position is that third party documents will not be required.
- Plaintiff's position is that she is not sure yet whether third party documents will be required and from how many third parties documents would be required.
- f. Subpoenas requesting Documents from third-parties must be served by August 22, 2025. Documents obtained from third-parties must be provided to all parties in this matter.
- g. There will/will not (circle one) be expert testimony in this case. If expert testimony will be needed, please describe the topic on which the expert(s) is expected to testify
- Defendant's position is that expert testimony will not be required.
- Plaintiff's position is that she is not yet certain whether she will have an expert witness.

#### 4. Early Settlement or Resolution

The parties have/have not (circle one) discussed the possibility of settlement. The parties request a settlement conference by no later than N/A. The following information is needed before settlement can be discussed:

Defendant currently has a no-settlement position on this case. Plaintiff currently has a motion for reconsideration pending before the Court.

#### 5. Other Matters

Plaintiff(s)/Defendant(s) (circle one) wish to discuss the following additional matters at the Initial Case Management Conference.

N/A

Respectfully submitted this \_\_\_\_ day of March, 2025

\_\_\_\_\_

Name

\_\_\_\_\_

Address

\_\_\_\_\_

Phone number

\_\_\_\_\_

Email

\_\_\_\_\_

Party representing (if applicable)